To: "Robert Law" [rlaw@demaximis.com]
Cc: []
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From: CN=Stephanie Vaughn/OU=R2/O=USEPA/C=US
Sent: Tue 11/6/2012 8:29:12 PM
Subject: HV CWCM, Comment 58 follow up....

Hi Rob,

I just realized I never sent this to you. Below is a summary of EPA's recommendations to resolve the issues related to Comment 58.

Please let me know if you have any questions.

Thanks,
Stephanie

There are two issues related to the HV-CWCM sampling and analysis procedures that must be addressed prior to approval of the revised QAPP. These relate to monitoring the accuracy of the PUF sampling and analysis system, and identifying potential breakthrough of contaminants bound to colloidal particles within the natural waters of the Passaic River. The following outlines our recommendations, which we do not think will significantly impact the schedule:

1. EPA recommends that the CPG laboratory analyze an accuracy sample similar to that used in their initial evaluation of the PUF as presented in their May 4th 2012 memorandum titled Summary of Analytical Perspectives HVS Laboratory Study Results. As part of this study, Analytical Perspectives processed a none colloidal spiking solution containing native contaminants and surrogates through the PR2900 and extracted the PUF for analysis. Since this process has a limited set of replicated results, it is recommended that the recoveries presented in the May 4th memorandum form the basis for establishing a range to measure acceptable performance, i.e., a control chart. Although it would be desirable to include native PCB compounds in the spiking solution described in the May 4th memorandum, we understand that it may be difficult to work this into the initial round of sampling and that a set of replicate data is not available for PCBs as it is for dioxin and PCB surrogates. Since this process has already been used by the laboratory, the development time should be minimal with no perceived impact to the project schedule.

2. In order to help verify the capture of the hydrophobic organic compounds (HOCs) that may be adhered to colloids, a minimum of a ten liter portion of the filtrate needs to be captured from one brackish and one fresh water sample for high volume extraction and analysis for targeted HOCs. This sample should be collected in a manner that best represents the volume of water pumped through the PR2900 system. The use of a flow splitter or metered capture might be the simplest way to accomplish this task. In order to minimize the burden of this request on the CPG's laboratory, EPA is willing to have its project subcontracted laboratory perform the necessary analyses on these high volume samples.